

PX 11

DECLARATION OF MARK A. JOYNER

PURSUANT To 28 U.S.C. § 1746

I, Mark A. Joyner, hereby state that I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify competently as follows:

1. I am a United States citizen over the age of 18 years old. I am employed as an Investigator with the Federal Trade Commission's ("FTC") Division of Marketing Practices. The Division of Marketing Practices investigates persons and entities that may be violating the FTC Act and other laws enforced by the FTC.
2. Below is a screenshot of Peter Pru's YouTube Channel on September 19, 2024:

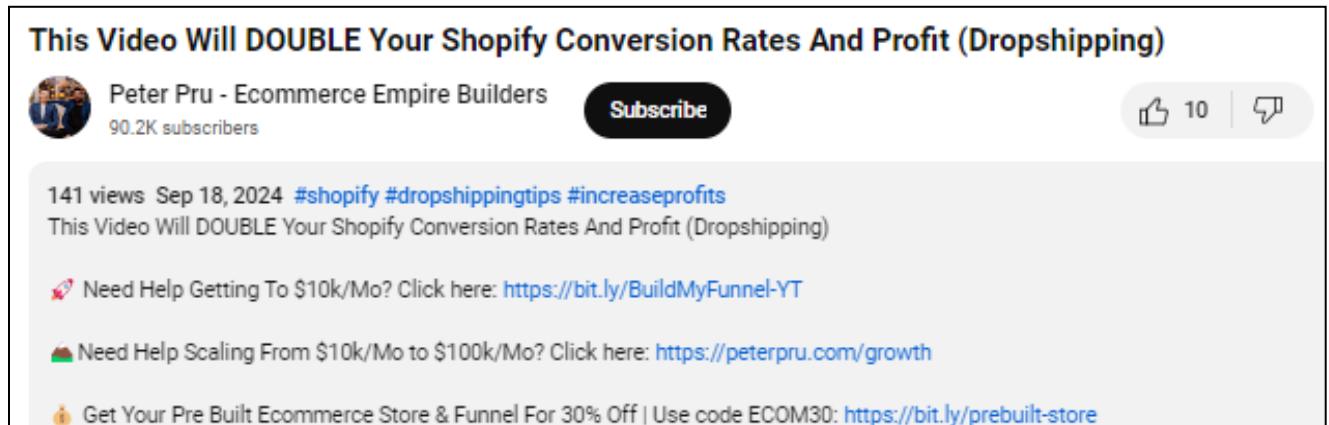
Peter Pru - Ecommerce Empire Builders
 @ecommerce.empire.builders • 90.2K subscribers • 1.7K videos
 What first started as a side project and a way of sharing my eCommerce strategies with u...more
[instagram.com/ecommerce.empire.builders](https://www.instagram.com/ecommerce.empire.builders) and 4 more links
 Subscribe

Home Videos Shorts Live Podcasts Playlists Community

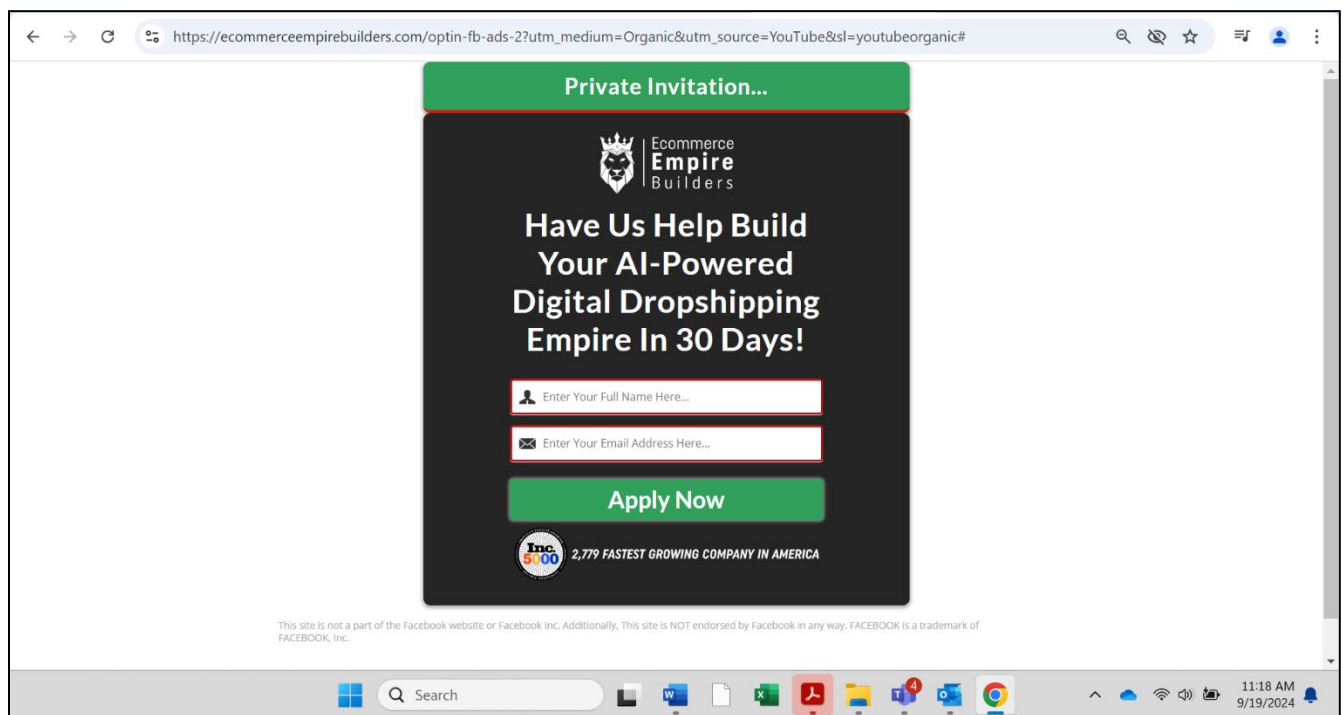
Latest Popular Oldest

| Video Title | Views | Time Ago |
|---|------------|-------------|
| This Video Will DOUBLE Your Shopify Conversion Rates And Profit (Dropshipping) | 255 views | 1 day ago |
| Take My 2 Comma Club Funnel for Free! (Download And Use My Exact Digital... | 412 views | 3 days ago |
| Beginner \$20/Day Facebook Ads That Generate \$1000's In Sales! Dropshipping A... | 732 views | 6 days ago |
| How to Build A Digital Dropshipping Business in 2024 (Full Course 2 Hours+... | 1.1K views | 8 days ago |
| How To Get FREE \$10K/Month Digital Products To Sell TODAY! (Digital... | 1.3K views | 10 days ago |
| My \$20/Day ONLY Facebook Ads Testing Strategy That Works! (Over \$100,000 In... | 866 views | 13 days ago |
| FREE 6 FIGURE Digital Product Research METHOD REVEALED! (Digital Dropshipping) | 551 views | 2 weeks ago |
| This \$71,000 Digital Dropshipping Product Method Gets INSTANT PROFITS! | 1.4K views | 2 weeks ago |

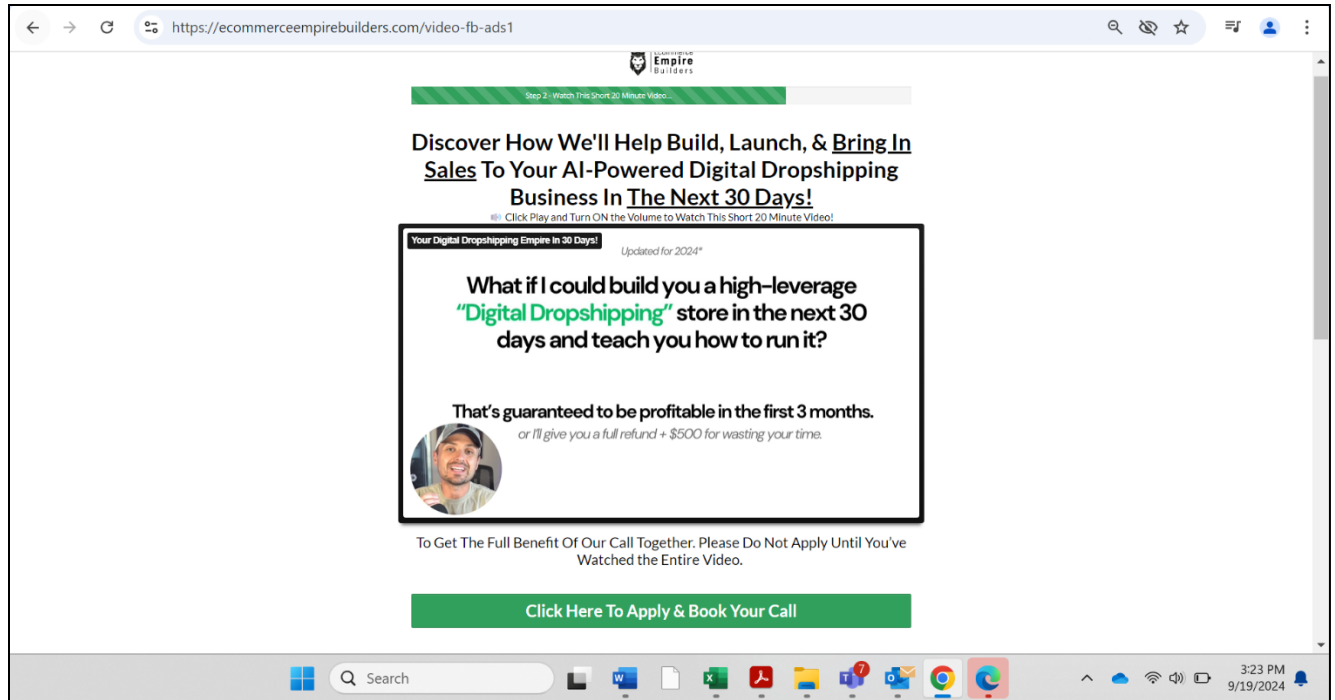
3. On September 18, 2024, Peter Pru posted a video titled “This Video WILL DOUBLE Your Shopify Conversion Rates and Profits (Drop)” The video description had a hyperlink titled “Need Help Getting to \$10k/Mo? Click here.”



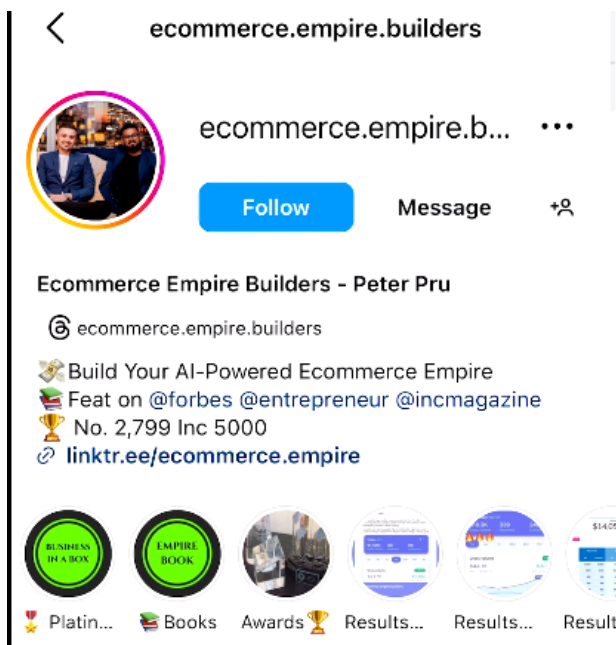
4. The hyperlink redirected to the following webpage:



5. The “Apply Now” redirected to a webpage with a video featuring Peter Pru and a link to book a call to learn more. The video contained an automatic transcription of Mr. Pru’s presentation. I took screenshots of the video and transcription, which is **Attachment A**.



6. On September 19, 2024, I visited the Ecommerce Empire Builders (“EEB”) Instagram page (ecommerce.empire.builders). The page lists 4,147 posts, and 116K followers.
7. On September 19, 2024, the EEB Instagram page contained a link at the top of the page labeled Business in Box.



8. Pursuant to the TRO, TD Bank produced documents to the FTC. According to TD Bank, Mr. Prusinowski and his wife maintain a joint checking account (X9904). Below is a summary of activity in the account from January-August, 2024:

| Summary of Joint TD Checking Account X9904 | | | | | |
|--|-------------------|-----------|-------------------|-------------|---|
| Month | E-Deposits | Deposits | E-Payments | Checks-Paid | Notes |
| January 2024 | 30,692.04 | | 36,984.81 | | |
| February 2024 | 40,374.37 | | 14,657.95 | 365.00 | |
| March 2024 | 17,719.51 | 301.26 | 38,970.33 | | |
| April 2024 | 23,568.01 | 75,000.00 | 90,956.98 | 285.00 | \$75,000 check deposit from Precision Watches, Inc. |
| May 2024 | 13,287.26 | 3,345.00 | 13,720.12 | 180.00 | |
| June 2024 | 38,181.29 | 2,681.23 | 23,830.78 | | |
| July 2024 | 10,340.55 | 261.65 | 15,538.40 | 30,360.00 | \$30,000 check to Moses Auto Group |
| August 2024 | 10,000.00 | | 12,147.62 | | |
| Subtotals | 184,163.03 | 81,589.14 | 246,806.99 | 31,190.00 | |
| Totals | 265,752.17 | | 277,996.99 | | |

- a. Mr. Prusinowski received \$160,000 from Empire Holdings Group (X9912):

| Summary of Deposits | | |
|---------------------|------------------------------------|---------------------|
| 1/29/2024 | Distribution from EHG Acct. X9912 | \$30,000.00 |
| 2/28/2024 | Distribution from EHG Acct. X9912 | \$10,000.00 |
| 3/8/2024 | Distribution from EHG Acct. X9912 | \$25,000.00 |
| 3/26/2024 | Distribution from EHG Acct. X9912 | \$15,000.00 |
| 4/19/2024 | Check from Precision Watches, Inc. | \$75,000.00 |
| 4/25/2024 | Distribution from EHG Acct. X9912 | \$15,000.00 |
| 5/28/2024 | Distribution from EHG Acct. X9912 | \$10,000.00 |
| 6/26/2024 | Distribution from EHG Acct. X9912 | \$10,000.00 |
| 7/3/2024 | Transfer From Schwab Acct.X58656 | \$25,000.00 |
| 7/29/2024 | Distribution from EHG Acct. X9912 | \$10,000.00 |
| 8/27/2024 | Distribution from EHG Acct. X9912 | \$10,000.00 |
| Subtotal | | \$235,000.00 |
| Other | | \$30,752.17 |
| Total | | \$265,752.17 |

- b. Mr. Prusinowski transferred \$132,000 to a Schwab Brokerage account (X8785), \$30,000 to Moses Auto, and \$36,230.48 in mortgage payments to Penn Community.

| Summary of Payments | | |
|---------------------|--|-----------------------|
| 4/23/2024 | Transfer to Schwab Brokerage Acct. No. X8785 | (\$75,000.00) |
| 6/24/2024 | Transfer to Schwab Brokerage Acct. No. X8785 | (\$7,000.00) |
| 1/30/2024 | Transfer to Schwab Brokerage Acct. No. X8785 | (\$25,000.00) |
| 3/11/2024 | Transfer to Schwab Brokerage Acct. No. X8785 | (\$25,000.00) |
| 7/22/2024 | Check to Moses Auto | (\$30,000.00) |
| | Monthly Mortgage Payments (Penn Community) | (\$36,230.48) |
| Subtotal | | (\$198,230.48) |
| Other | | (\$79,766.51) |
| Total | | (\$277,996.99) |

9. Pursuant to the TRO, Schwab produced documents to the FTC. According to Schwab:
- a. Atlas Fund Limited Partnership opened a brokerage account (X7019) in June 2021. Mr. Prusinowski and his wife are the sole signatories on the account and signed as general partners. The mailing address on the statements is Mr. Prusinowski's personal address. Limited Partner Atlas Fund Trust is not listed as a signatory on account.
 - b. On July 5, 2024, Empire Holdings Group LLC (X6852) transferred \$25,000 to Atlas Fund Limited Partnership (X7019).
 - c. Atlas Fund Limited Partnership appears to have received additional funds from Empire Holdings Group LLC. For example, on January 29, 2024, there was a \$30,000 transfer from Empire Holdings Group LLC (TD Bank X9912) to Mr. Prusinowski (TD Bank X9904). On January 30, 2024, Mr. Prusinowski transferred \$25,000 from TD Bank X9904 to his Schwab Brokerage account X8785. On February 2, 2024, Mr. Prusinowski transferred \$25,002.21 from his Schwab Brokerage account X8785 to an Atlas Fund Limited Partnership Schwab Brokerage account (X7019).

10. On September 25, 2024, the Court Appointed Receiver sent the FTC photos of a safe deposit box at TD Bank that belonged to Mr. Prusinowski. The box contained dozens of precious metal coins and bars.
11. On September 26, the Court Appointed Receiver provided the FTC a copy of a Belize registration certificate for Atlas Fund Trust recorded on April 28, 2021



12. September 25, 2024, Defendants' counsel produced to the FTC financial disclosure documents pursuant to the TRO. According to the disclosure:

- a. Atlas Fund Limited Partnership has the following address and ownership structure:

Atlas Fund Limited Partnership
8160 E Butherus Ste. 4, Scottsdale AZ 82858
Type of Business: Limited Partnership
Owner/Ownership:
General Partner Peter Prusinowski (1%)
General Partner Kellie Prusinowski (1%)
Limited Partner Atlas Fund Trust (98%)

- b. On September 19, 2024, Atlas Fund Limited Partnership transferred \$400,000 to Gordon Rees Scully Mansukhani, LLP as a legal retainer in this matter. The

disclosure states the Defendants have incurred approximately \$150,000 in legal fees to date.

- c. On September 19, 2024, Empire Holdings Group LLC, transferred \$77,000 to Gordon Rees Scully Mansukhani, LLP. The disclosure states that these funds were for legal services rendered to date.

I Declare under penalty of perjury that the foregoing is true and correct.

Executed on September 19, 2024, in Washington, DC

/s/ Mark Joyner

Mark Joyner


Attachment A

Your Digital Dropshipping Empire In 30 Days!

Updated for 2024*

**What if I could build you a high-leverage
"Digital Dropshipping" store in the next 30
days and teach you how to run it?**

That's guaranteed to be profitable in the first 3 months.
or I'll give you a full refund + \$500 for wasting your time.



high leverage digital drop shipping store in the next 30

Transcript

Search transcript

What if I could build you a simple, high leverage digital drop shipping store in the next 30 days and teach you how to run and scale it.

And if you can't make it profitable in the first 90 days, I'll give you a full refund plus 500 bucks


for wasting your time. This is a new updated model for 2024 and beyond. Perfect. For those of you that are just getting into online business,

or maybe you've tried some e-commerce stuff or other models in the past and it just hasn't worked out the way it was supposed to,

or maybe you're someone who's currently has a Shopify store, maybe you're an Amazon FBA seller, you have something going already,

but you're not seeing the results that you were promised.

Your Digital Dropshipping Empire In 30 Days!



but you're not seeing the results that you were promised.

Transcript

Search transcript

but you're not seeing the results that you were promised. Maybe you're looking for a proven path out of your nine

to five and you're overwhelmed trying to figure out what works, what doesn't? I can tell you from experience, it takes a lot of time


and effort trying to figure out things all by yourself, and that is why we want to take that burden off of you.

Build out all the systems and processes that you need to make sure you're actually successful by installing this new digital dropshipping model

that I've used to scale my own stores as well as the stores of 500 plus of my own clients.

The problem you're facing right now is that you're probably seeing dozens upon dozens of other ads like these with business gurus promising all sorts of crazy results,

Your Digital Dropshipping Empire In 30 Days!



and it's difficult to figure out who's legit

Transcript

Search transcript


and it's difficult to figure out who's legit and who's fake, right? And there's so many online business models, I'm sure you're thinking which one is the best one right now. I'm gonna show you why I believe digital drop streaming is the best model for building the kind of life you want today in 2024 and beyond. So now you're probably thinking, Peter, I've heard all of this before.

What's your offer and why should I listen to you? Well, my name is Peter Pru. I started my first online business at the age of 18.

After countless swings in e-commerce, I finally cracked the code and was able to leave my nine to five job around 2014.

Over a decade later, I've now scaled dozens upon dozens

Your Digital Dropshipping Empire In 30 Days!



to be involved in their lives without feeling

Transcript

Search transcript

and have the opportunity to be involved in their lives without feeling guilty or stressed from work. Now, if you too want to create this type of freedom by starting an online business and working with my team to help you build out your niche, your offer, ads, fulfillment, everything from A to Z in the next 30 days so you can skip months or even years of trying to figure it out yourself,

then you are at the right place at the right time. So you might be thinking, how does this all work?

Well, first off, we are going to work with you and pick out your niche for you. That's the most important part of all this.

Who's the group of people that you are going to be selling to? We've helped clients achieve success in hundreds,

Your Digital Dropshipping Empire In 30 Days!

Step 1: Niche Selection

- Survival
- Pottery
- Knitting
- Chakra
- Drawing
- Dogs
- Cats
- Cooking
- Candles
- Baby
- Health + Beauty
- Apparel
- Tech Gadgets
- and dozens more...

WHO'S THE GROUP OF PEOPLE

Who's the group of people that

Transcript

Who's the group of people that you are going to be selling to? We've helped clients achieve success in hundreds, about hundreds of different niches, including dog toys, cooking tech gadgets, and countless others. Number two, we're then going to build out the offer you're actually going to sell to people. So we'll help you find a product that we think will sell extremely well. We'll make sure the margins make sense, help you find a solid supplier from our Rolodex, and set up an entire drop streaming arrangement with them for you. Third, we're then going to help build out your entire sales funnel. Now, there's a lot of elements that go into building a digital dropshipping funnel, building out the pages, putting the imagery together, putting in the different upsells, order bumps and products

Your Digital Dropshipping Empire In 30 Days!

Step 2: Offer Creation

- Identify potential winning products
- Analyze profit margins
- Craft bundles/packages
- Source products from high quality supplier
- Setup dropshipping agreement

TO SELL TO PEOPLE.

going to sell to people.


Transcript

going to sell to people. So we'll help you find a product that we think will sell extremely well. We'll make sure the margins make sense, help you find a solid supplier from our Rolodex, and set up an entire drop streaming arrangement with them for you. Third, we're then going to help build out your entire sales funnel. Now, there's a lot of elements that go into building a digital dropshipping funnel, building out the pages, putting the imagery together, putting in the different upsells, order bumps and products in there as well, which are gonna get you paid a substantial amount more than a typical Shopify store and Amazon FBA store. Because we are also install digital drop shipping, which means some of these order bumps and upsells are

Your Digital Dropshipping Empire In 30 Days!

Step 3: Funnel Build

- Building out the pages
- Design and Images
- Website copywriting
- Offer economics*
 - Upsells
 - Order bumps
 - Digital products (high margin)
 - Monthly subscription (recurring revenue)



YOU PAID A SUBSTANTIAL AMOUNT

which are gonna get you paid a substantial amount more than

03:32

Transcript

Search transcript

which are gonna get you paid a substantial amount more than a typical Shopify store and Amazon FBA store. Because we are also install digital drop shipping,

which means some of these order bumps and upsells are going to deliver a hundred percent margin digital products to your customers.

Yes, these products are extremely high margin, 100% and can add so much fuel to the fire of your business.

We're focusing on maximizing profit margins and these are a great way to do it. And most importantly, also adding in


that monthly continuity piece, which is like a monthly reoccurring revenue of your business, kind of like a subscription box like BarkBox

or Dollar Shave Club where people pay you on a monthly basis to buy from you. We'll help build all of this out for

Your Digital Dropshipping Empire In 30 Days!

Step 3: Funnel Build

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WHERE PEOPLE PAY

where people pay you on a monthly basis to buy from you.

Transcript

Search transcript

or Dollar Shave Club where people pay you on a monthly basis to buy from you. We'll help build all of this out for you,


picking out your niche, your offer components that's gonna make that niche actually wanna buy from you. And actually finally, building out

that entire digital drop shipping sales funnel, we're gonna take that entire burden and do it for you so you don't have to worry

or waste any of your own time doing it all for yourself. Next, you're gonna be actually getting access to our e-Commerce Empire Academy because

after we hand this funnel over to you, we wanna make sure you have all the resource to actually manage it and run your business properly.

Your Digital Dropshipping Empire In 30 Days!



EMPIRE ACADEMY IS.

That's what the e-Commerce Empire Academy is.

Transcript

Q Search transcript

That's what the e-Commerce Empire Academy is. It's constantly being updated and it really is your, essentially your training program

so you can manage and scale your business properly, whether you're new or an existing seller, all of the trainings you need are in there


to make sure you are never lost, you are never confused, and you know exactly the steps for your business that you should be taking.

This piece is essential because we're going to be handing this business off to you at the end of our time together.

So you need to know how to run it. This isn't something that's completely passive, and it's not something where you'll need

to share your profits with us and have no clue what's going

Your Digital Dropshipping Empire In 30 Days!



AND HAVE NO CLUE

and have no clue what's going on behind the scenes.

Transcript

Q Search transcript

to share your profits with us and have no clue what's going on behind the scenes. This is a business that you 100% own,

and we're here to help you learn how to run it so when the time comes to hand it off


to you, you're gonna be ready. You'll also be getting three months access inside of our Inner Circle program. Now, this is going to be the mentorship aspect

and the continued support you get from us on a daily basis. That means that every single day you're gonna have access

to myself, Jordan, and a bunch of our other coaches that built out your funnel. We're gonna be there helping you on a daily continued basis

to make sure that you are on the right path and you're

Your Digital Dropshipping Empire In 30 Days!



THAT YOU'RE ON THE RIGHT PATH

to make sure that you are on the right path

Transcript



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to make sure that you are on the right path and you're managing your funnel properly. You're getting those sales and being able to start scaling that business as well. And we're gonna be there for you on a daily basis to do that for you and help you reach your goals. In addition to the Inner Circle, there's a bunch of advanced trainings in there that we're not gonna get into right now, but they're also gonna help you grow your business even faster. And you're also gonna be getting three coaching calls per week with us, okay? That means you're gonna be able to jump on a conference call with us, ask any sorts of questions that you might have, concerns that you might have, and we're gonna be able to guide you in the right direction. Look, not everyone has over 500 real stores

Your Digital Dropshipping Empire In 30 Days!

YES! Add This To My Cart For \$89.99 (70% Off The Regular Price) plus free Shipping! Click or Tap Here To Begin Your Order

Let's Take A Closer Look At This Premium "KitchenPro Sink Rack"

AND LAUNCH FOR THEIR CLIENTS.

that they've helped build and launch for their clients

Transcript

Q Search transcript

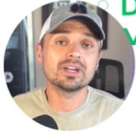
that they've helped build and launch for their clients and multi seven figure business revenue across their own stores to back up what they're saying.

And what I'm offering you today is helping you pick a high converting niche, designing your offer, building out your entire subscription based sales funnel with digital products as well, ad copy, email copy, literally all of it. And we're also giving you the training that you need for that continued support and education that you need for your business, and as well as giving you mentorship on a daily basis to make sure you're on the right track and continuing to move forward inside your business. So if that sounds interesting, apply to work with us below,

Your Digital Dropshipping Empire In 30 Days!

What you'll get

- High-converting niche
- The "perfect offer" design
- Fully built sales funnel with:
 - Upsells
 - Order bumps
 - Digital products
 - Monthly subscription



- Ad copy
- Email Copy
- Launch
- Training you how to run the business
- 3x weekly mentorship calls
- 90 days of support

and education that you need for your business,

Transcript

Search transcript

to make sure you're on the right track and everything is moving forward inside your business. So if that sounds interesting, apply to work with us below,

and if you want to see some more proof, I'm glad you asked. Here's a view of everyone who, who's applied to work

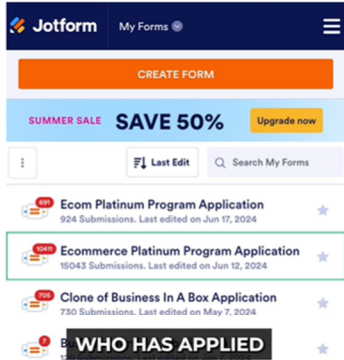
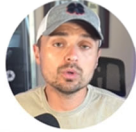
with us over just the last 12 months alone, and here's a screenshot of the over 500 plus stores we've helped launch

and build for our clients. Here's an example of a client who stayed with us for years and worked with us directly

to help run and scale their store. And here's an example of all of the ad accounts we've managed for our client stores

and launches, and here's some testimonials from real clients. You can Google them or find them on our YouTube channel

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Here's a view of everyone who, who's applied to work

Transcript

Search transcript

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and launches, and here's some testimonials from real clients. You can Google them or find them on our YouTube channel

where we post these interviews regularly. Now, this is what even more so, really sets us apart. Over 10 plus years in

Your Digital Dropshipping Empire In 30 Days!

Ecommerce Empire Builders

- 10+ years in online business experience
- Multi 7-figures in client results
- 200,000 followers across social
- 30,000+ customers around the world

Now, this is what even more so, really sets us apart.

Transcript

Search transcript

where we post these interviews regularly. Now, this is what even more so, really sets us apart. Over 10 plus years in online business experience,

over multi seven figures in client results generated over 200,000 plus social media followers across all of our social media channels.

Over 30,000 customers of our products across the world. If you wanna look up our trust pilots, 4.9 out of five stars, over 200 views are from our clients.

And look, I've been doing this for a long time. I'm a four times two comma Club winner, two comma Club X winner.

My team is included on all three of those. So you know, this isn't just something I'm handing off to some va, but I have an entire team who knows

what they're doing and you can see the years of each of

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what they're doing and you can see the years of each of these. We've been doing this since 2016. So look, I could go on and on.

We have hundreds of positive reviews from customers and past clients. We've worked one-on-one with, but they're basically all say the same thing.

This is legit, we know what we're doing, but we do have limited resources. So we only work with a select number of clients each month

so we can provide the in-depth support and mentorship needed to launch and scale your e-commerce store. Again, if you're interested in having us help research

and select your niche craft, your perfect offer, design a high converting funnel with upsells and a subscription element to maximize average order value

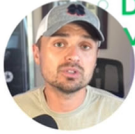
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OF EACH OF THESE.

Your Digital Dropshipping Empire In 30 Days!

What you'll get

- High-converting niche
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 - Monthly subscription



- Ad copy
- Email Copy
- Launch
- Training you how to run the business
- 3x weekly mentorship calls
- 90 days of support

and reoccurring revenue, crafting

Transcript

Search transcript

and reoccurring revenue, crafting and installing digital drop shipping for your offer to maximize your take home margins, craft all

of your ad copy and your emails, and launch your business, plus 90 days of ongoing support so you can take full ownership of your business, then click


Below right now and apply for a call with my team. But I do wanna reiterate this. This is not a get rich quick scheme.

This requires work on your end, but if you're willing to learn, this is a vehicle to help you take control of your income

and actually gain the freedom you've been promised in the past. Real freedom comes through discipline, learning how to run your business and taking consistent daily actions

to reach your goals. So if you're up for the challenge, click

Your Digital Dropshipping Empire In 30 Days!



Real freedom comes through discipline, learning how

Transcript

Search transcript

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to reach your goals. So if you're up for the challenge, click the button below to book a call with my team.

I look forward to speaking with you and working with you soon.